## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.



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February 1, 2012

Ms. Susan Hedman Regional Administrator U.S. EPA, Region V, R-19J 77 West Jackson Boulevard Chicago, Illinois 60604-3507

US EPA RECORDS CENTER REGION 5

Dear Ms. Hedman:

Re: Beck's Lake Site

> South Bend, St. Joseph County, Indiana - Designation as a Superfund Alternative

Approach

The Indiana Department of Environmental Management (IDEM) is providing this letter to convey its support to the United States Environmental Protection Agency (U.S. EPA) regarding the designation of the Beck's Lake Site located in South Bend, St. Joseph County, Indiana, as a Superfund Alternative Approach (SAA). The Beck's Lake Site, U.S. EPA ID# IND980904379, is bordered on three sides by residential housing and on one side by a wooded area. The site includes a city park (LaSalle Park) and an adjacent apartment complex.

The source of the contamination at LaSalle Park is historic dumping of waste material that took place there from the 1930's through the 1970's. The Beck's Lake area was once filled with waste material from a nearby manufacturer of automotive parts. The waste material was contaminated with high levels of arsenic and lead. As a result, there appears to be ongoing potential exposure of residents including but not limited to residents of the adjacent apartment complex, which is located at the western edge of the fill area that is contaminated with levels of arsenic considered unsafe for residential settings. The neighborhood around the site has readily apparent environmental justice implications. Historically, the community near Beck's Lake (LaSalle Park) has been vocal about their concerns for environmental conditions surrounding this site.

The threshold eligibility criteria for using the Superfund Alternative Approach are:

- 1) Site contaminants are significant enough that the site would be eligible for listing on the National Priorities List of Hazardous Waste Sites (NPL) because the site would have a Hazard Ranking Score (HRS) ≥ 28.5.
- The site requires a long term response action.

3) There is a willing and capable potentially responsible party (*PRP*) to perform the investigation or cleanup.

A SAA approach would allow for proper and timely investigation of the nature and extent of the contamination and enable the responsible party or parties to determine cleanup alternatives for the impacted area that adequately protect the health of affected individuals while preserving federal funds. A SAA designation appears to be the most viable alternative for addressing the existing environmental problems surrounding the Beck's Lake Site. If in the future, the U.S. EPA determines that the responsible party or parties are not willing or capable of performing the investigation of the Beck's Lake Site, IDEM would support the decision to include the Beck's Lake Site on the NPL.

As the Commissioner of IDEM, I am authorized by Indiana Governor Mitchell E. Daniels to act in these matters on his behalf. I have considered my staff's recommendations and I fully support the designation of the Beck's Lake Site as a SAA site under supervision of the U.S. EPA. I request that the U.S. EPA assign staff appropriate to implement the process of the SAA. To expedite the process and reduce administrative expense, IDEM will share available site information with U.S. EPA.

If you require any additional information or have any additional questions please don't hesitate to contact Gabriele Hauer, Chief of the Site Investigation Section at (317) 233-2773.

Sincerely,

Thomas W. Easterly Commissioner

cc: Denise Boone, U.S. EPA Nuria Muniz, U.S. EPA Colleen Moynihan, U.S. EPA Mary Fulghum, U.S. EPA FOUR PAGES REDACTED Exemption 5, 5 U.S.C. \$552(b)(5) Deliberative Process